EXHIBIT A

Chart Comparing Requests Enforced in *United States v. Coinbase, Inc.** with Requests Sought from Kraken

Requests Enforced in *Coinbase*	Requests Sought from Kraken
Definition of Covered "User" "[A]ccounts with at least the equivalent of $20,000 in any one transaction type (buy, sell, send, or receive) in any one year during the 2013 to 2015 period[.]" *Coinbase* at *8. *****As the Court noted, "[t]he Narrowed Summons 'do[es] not include users: (a) who only bought and held bitcoin during the 2013-15 period; or (b) for which Coinbase filed Forms 1099-K during the 2013-15 period.'" *Coinbase* at *2.	***Definition of Covered "User"*** "For the purposes of each request below, "User" is defined as each Kraken user for which your records show any United States-based address, telephone number, email domain, internet protocol address, or associated bank or financial account information, produce the following records, for any combination of accounts with at least the equivalent of $20,000 in value of transactions (regardless of type) in cryptocurrency in any one year, for the period January 1, 2016 through December 31, 2020 unless otherwise stated"

"(1) [T]he taxpayer ID number, (2) name, (3) birth date, [and] (3) [sic] address[.]" *Coinbase* at *8.	1. Account user registration records for each account owned or controlled by the User including[1]:
	
	    a. User profile, User preferences, or account application information, regardless of how it is labelled or maintained, as follows:
	        i. Name (including full name, any pseudonym, or any user ID);
	        ii. Date of Birth;
	        iii. Taxpayer Identification Number
	        iv. Physical Address;
	        v. Telephone Number;
	        vi. Email Address;

Outside of *Coinbase* Order	b. History of all changes to the personal information identified above since the inception of the account;

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* No. 17-CV-01431-JSC, 2017 WL 5890052 (N.D. Cal. Nov. 28, 2017).

[1] The Kraken Summons indicates that "[t]his request does not include passwords, pins, private keys, security settings, and account recovery information."

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Outside of *Coinbase* Order.	c. Complete User history for internet protocol addresses used to access the account; and
Outside of *Coinbase* Order.	d. Complete User payment methods (e.g., linked bank or credit card accounts) regardless of date.
Outside of *Coinbase* Order. *"Records of Know-Your-Customer diligence" were "not necessary to achieve the Government's legitimate purpose at this stage[.]" *Coinbase* at *7.	2. With respect to any Know-Your-Customer due diligence questionnaires completed by a User, information relating to the User's employment, net worth, and source of wealth for individual Users, and for business Users, to the extent not provided in response to Request 1, above, legal name, business address, country, website, contact information, industry, goods and services, government-issued business registration or tax-identification number, and source of funds
Outside of *Coinbase* Order.	3. All exception reports produced by your anti-money laundering ("AML") system, and all records of investigation of such exceptions. This request does not include any suspicious activity reports ("SAR") that were ultimately generated as a consequence of an AML alert or any other information that would reveal the existence of a SAR.
"[R]ecords of account activity including transaction logs or other records identifying the date, amount, and type of transaction (purchase/sale/exchange), the post transaction balance, and the names of counterparties to the transaction[.]" *Coinbase* at *8.	4. All records of activity in the User's account including, but not limited to: a. Records identifying the date and time, amount, and U.S. dollar value of any purchase or sale of cryptocurrency for U.S dollar or foreign legal tender (fiat currencies) or other cryptocurrency; b. Records identifying the date and time, value (or expense) of any lending, borrowing, or margin position entered into in the account; c. Records identifying the date and time, amount, U.S. dollar value, transaction hash (ID), and blockchain

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	addresses for cryptocurrency units transferred into or out of the User's account from another Kraken user or from outside of Kraken. d. Records identifying the date and time, amount, and U.S. dollar value of any units of cryptocurrency received by the User in the account as a result of a chainsplitting event such as a hard fork or promotional event.
"[A]ll periodic statements of account or invoices (or the equivalent)." *Coinbase* at *8.	5. All records of account funding (deposits, withdrawals, or transfers) in U.S dollar or foreign legal tender, including transactions conducted through ACH transfers, wire or other electronic transfer, or any other form, and any and all invoices, billing statements, receipts, or other documents memorializing and describing such transactions.